

**ORIGINAL**

UNITED STATES DISTRICT COURT  
for the  
Eastern District of New York

**COGAN, J.****CURTIS WRIGHT**

Case No.

**CV 20 - 622**

(to be filled in by the Clerk's Office)

Plaintiff(s)

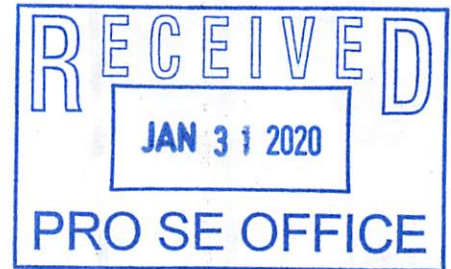
(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

**MARK GURLESKI**  
**JOHN PARENTE**  
**MICHA FARRELL**

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

Jury Trial: (check one) ☒ Yes ☐ No**COMPLAINT FOR A CIVIL CASE****I. The Parties to This Complaint****A. The Plaintiff(s)**

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name

**CURTIS WRIGHT**

Street Address

**BARE HILL CORR. FACILITY**

City and County

**MALONE**

State and Zip Code

**NEW YORK 12953**

Telephone Number

E-mail Address

**B. The Defendant(s)**

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

Pro Se 1 (Rev. 12/16) Complaint for a Civil Case

## Defendant No. 1

Name  
 Job or Title *(if known)*  
 Street Address  
 City and County  
 State and Zip Code  
 Telephone Number  
 E-mail Address *(if known)*

**MARK GURLESKI**  
**POLICE OFFICER**  
**79 PRECINCT - NYC POLICE DEPT.**  
**BROOKLYN - KINGS**  
**NEW YORK 11206**

## Defendant No. 2

Name  
 Job or Title *(if known)*  
 Street Address  
 City and County  
 State and Zip Code  
 Telephone Number  
 E-mail Address *(if known)*

**JOHN PARENTE**  
**POLICE OFFICER**  
**79 PRECINCT - NYC POLICE DEPT.**  
**BROOKLYN - KINGS**  
**NEW YORK 11206**

## Defendant No. 3

Name  
 Job or Title *(if known)*  
 Street Address  
 City and County  
 State and Zip Code  
 Telephone Number  
 E-mail Address *(if known)*

**MICHA FARRELL**  
**POLICE OFFICER**  
**79 PRECINCT - NYC POLICE DEPT.**  
**BROOKLYN - KINGS**  
**NEW YORK 11206**

## Defendant No. 4

Name  
 Job or Title *(if known)*  
 Street Address  
 City and County  
 State and Zip Code  
 Telephone Number  
 E-mail Address *(if known)*

**II. Basis for Jurisdiction**

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? *(check all that apply)*

☒ Federal question ☐ Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

**A. If the Basis for Jurisdiction Is a Federal Question**

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

**This action arises under and is brought pursuant to 42 U.S.C. Section 1983 to remedy the See attachment A for rest.**

**B. If the Basis for Jurisdiction Is Diversity of Citizenship****1. The Plaintiff(s)****a. If the plaintiff is an individual**

The plaintiff, *(name)* **CURTIS WRIGHT**, is a citizen of the State of *(name)* **NEW YORK**.

**b. If the plaintiff is a corporation**

The plaintiff, *(name)* \_\_\_\_\_, is incorporated under the laws of the State of *(name)* \_\_\_\_\_, and has its principal place of business in the State of *(name)* \_\_\_\_\_.

*(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)*

**2. The Defendant(s)****a. If the defendant is an individual**

The defendant, *(name)* **MARK GURLESKI**, is a citizen of the State of *(name)* **NEW YORK**. Or is a citizen of *(foreign nation)* \_\_\_\_\_.

**See attachments B for other defendants**

b. If the defendant is a corporation

The defendant, (name) \_\_\_\_\_, is incorporated under the laws of the State of (name) \_\_\_\_\_, and has its principal place of business in the State of (name) \_\_\_\_\_.

Or is incorporated under the laws of (foreign nation) \_\_\_\_\_, and has its principal place of business in (name) \_\_\_\_\_.

*(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)*

3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because *(explain)*:

**I am suing for more than that amount.**

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III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

**At all times herein, defendants were "persons" for purposes of 42 U.S.C. Section 1983 and action under color of the law to deprive plaintiff of his**  
**See Attachment C for rest.**

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IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

**See Attachment D**

**V. Certification and Closing**

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

**A. For Parties Without an Attorney**

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: January 27, 2020

Signature of Plaintiff

Printed Name of Plaintiff

  
CURTIS WRIGHT

**B. For Attorneys**

Date of signing: \_\_\_\_\_

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Street Address

State and Zip Code

Telephone Number

E-mail Address

**ATTACHMENT A**

deprivation, under color of state law, of rights guaranteed by the Eighth and Fourteenth, not to exclude any that have been deprived to the plaintiff herein, Amendments to the United States Constitution. This Court has Jurisdiction over this action pursuant to to 28 U.S.C. Section 1331 and 1343.

**ATTACHMENT B**

The defendant **JOHN PARENTE** is a citizen of the state of **NEW YORK**.

The defendant **MICHA FARRELL** is a citizen of the state of **NEW YORK**.

**ATTACHMENT C**

**Page 1**

constitutional rights, as set fourth more below:

**STATEMENT OF FACTS**

1. On or about December 5, 2017, at 1031 Myrtle Avenue in Brooklyn, New York at 6:00 P.M., I Curtis Wright was being chased by plain clothe officers'. They chased me into 1031 sumner housing and apprehended me.

2. Defendant (P.O. M. Gurleski) tacked me to the ground, then defendant (P.O. unknown officer's) came to aid and began to punch me in the face while defendant (P.O. M. Gurleski) had detained me on the floor.

3. At this point defendant (P.O. unknown officer) entered the building and try to tase me with the tasergun, but it did not penetrate the skin, defendant (P.O. unknown officer) reloaded the taser gun and proceeded to tase me.



**ATTACHMENT C**

**Page 2**

4. Afterwards defendant (P.O. unknown officer) lifted up my jacket and tasered me directly on my lower back.

5. The defendants (P.O. unknown officers) then proceeded to put me in the police vehicle, to take me to woodhull hospital for medical treatment for my taser wounds on my back.

6. At woodhull hospital I received two stiches for puncture wound caused by the taser to my back.

7. Medical Doctor **Jean-Claude Alexis** released me into police custody. At approximately 6:00 A.M. I was taken to the 77th precinct in crown height, Brooklyn, New York 11213.

**injuries sustained**

8. As a direct and proximate result of the defendants violation of the plaintiff's constitutional rights, plaintiff has suffered

**ATTACHMENT C**

**Page 3**

severe and substantial damages. These damages include pain and suffering, humiliation, embarrassment, inconvenient, mental and emotional anguish and distress, and other compensation damages in an amount to be determined by jury and the court.

End of page 3

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**ATTACHMENT D**

**PRAYER FOR RELIEF**

**WHEREFORE**, Plaintiff request judgment against Defendants for their malicious, callous, and deliberate indifference to the Plaintiff's Civil Rights as follows:

A. To be granted compensatory damages to be determined at trial, but not less than 750,000.00 dollars for Plaintiff;

b. To be awarded punitive damages against the Defendants to deter future acts that were against the Plaintiff by Defendants herein, in the amount of 3,000,000.00 dollars;

c. For any other relief the Plaintiff may show himself justly entitled.